REMARKS/ARGUMENTS

Claims 11-23 and 49-53 are currently pending in this application. Claims 11 and 18 have been amended and new claims 49-53 have been added. In view of the above amendments and following remarks, applicant respectfully submits that the application is in condition for allowance. Applicant therefore, respectfully requests reconsideration and allowance of the application.

Claims 18-23 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office action alleges that the claimed "address data formatted in accordance with a particular format from a plurality of possible formats," is not described in the specification. Claims 18 is amended to include "receiving address data with different formats."

Applicant respectfully submits that above amended limitation is fully supported in the specification. For example, starting on page 14, line 25 to page 16, line 19, the specification refers to different address books that may have different formats. Accordingly, it is respectfully requested that the above-mentioned rejection be withdrawn.

Claims 11-12, and 14-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Pierce et al. (US 5,930,796); claim 13 is rejected under 35 U.S.C. 103(a) as being unpatentable over Pierce, in view of Hooper et al. (US 5,819,282); and claims 18-23 are rejected under 35 U.S.C. 103(a) as being unpatentable

over Pierce, in view of Wesinger, Jr. et al. (US 6,324,538 B1).
In view of the above amendments and following remarks,
Applicants respectfully submit that the application is in
condition for allowance, therefore, reconsideration and
allowance of the application are respectfully requested.

Amended independent claim 11 includes, among other
limitations, "accessing a companion file of pre-validated
addresses for validating the address," "printing the address on
the VBI, if the address is validated based on the companion
file," "if the address is not validated based on the companion
file, receiving the address from a terminal remote from the
database," and "comparing the address from the remote terminal
with the database of pre-approved addresses for validating the
address." Applicant respectfully submits that Pierce does not
disclose, nor does it suggest the above recited language.

Rather, the system of Pierce "checks whether an address
record exists for the mailing address of the envelope. If a
record does not exist, then at step 108, the system enters the
address into an address record in the record database. . . .
Once it is determined that an address record exists for the
address, either at step 104 or from step 112, then, at step 114,
the system processes the user print request. At step 116, a
determination is made that the address record is valid. . . ."
(Col. 3, line 61 to col. 4, line 3, and FIG. 2, underlining
added).

Furthermore, the system of Pierce "verifies a CD-ROM hosted
USPS ZIP+4 National Directory is present and valid for the

current system date. The CD-ROM is needed to assign addresses with valid DPBC's. At step 208, a PC meter (or other) application program sends address data to the postal coding engine and requests DPBC assignment. At step 212, <u>a check is made to determine if the address is valid using the CD-ROM hosted USPS ZIP+4 National Directory</u>. (Col. 4, lines 12-17, underlining is added).

Thus the system of Pierce checks a record database for valid DPBC's <u>AND</u> the CD-ROM for address validation. In other words, no matter whether the address has a valid DPBC or not, the system of Pierce still has to access the CD-ROM (that is an alleged local database) to validate the address.

In contrast, the present invention, claimed by claim 11, accesses a companion file for validating an address and prints the address on a VBI, if the address is validated based on the companion file. If the address is not validated based on the companion file, the invention then receives the address from a terminal remote from a database and compares the address with the database for validating the address.

As a result, Pierce does not teach or suggest the above-mentioned limitations of the amended claim 11. Furthermore, as the Examiner accurately states, Pierce does not teach "a terminal remote from the database," as required by claim 11. (Office action, page 5, first paragraph). Accordingly claim 11 is patentable in view of Pierce and the other cited references. Therefore allowance of claim 11 is respectfully requested. Dependent claims 12-17 depend directly or indirectly from claim

11 and include all of the limitations of claim 11. Therefore these claims are also allowable as is claim 11, and for additional limitations recited therein.

Independent claim 18 includes, among other limitations, "storing a plurality of pre-approved addresses with a predetermined format in the database," "receiving address data with different formats," "mapping the received address data with the different formats into the predetermined format," "comparing the address data in the predetermined format with pre-approved addresses in the database for validating the address," "presenting the results for selection by a user, if one or more matches are found," and "printing a selected address on the VBI."

Applicant respectfully submits that none of the cited references, alone or in combination, disclose or suggest the recited elements. First, neither Pierce nor Wesinger, alone or in combination, teach or suggest "presenting the results for selection by a user, if one or more matches are found," and "printing a selected address on the VBI," as required by the amended independent claim 18.

Wesinger might teach displaying the results of a search, however, it does not teach "presenting the results <u>for selection</u> by a user, if one or more matches are found," and "printing a <u>selected</u> address on the VBI."

Second, Applicant respectfully disagrees with the assertion in the Office action that "the arrangement of receiving address

data either a single address or a batch of address as a particular format from a plurality of format" and "the address being "entered into an address record with the structure as in FIG. 5 (Col. 3, lines 60-64) as step of mapping the received address data with the particular format into a predetermined format." (Office action, page 8, last paragraph.).

Applicants are unable to find any disclosure in the cited text and FIG. 5 that teaches or suggests "receiving address data with different formats," "mapping the received address data with the different formats into the predetermined format," as recited by the amended independent claim 18. In fact, the address record depicted in FIG. 5 requires a specific (one) format, that is, ADDRESS, CITY, STREET, ZIP+4, DPBC). Also, the other records need to be stored in the same format to be able to "postal code" an address.

Additionally, the fact that Pierce states "[t]he following description will be for a single address; however, those skilled in the art will understand that the following steps may be performed for a batch of addresses," (col. 3, lines 55-57) does not teach or suggest "receiving address data with different formats," and/or "mapping the received address data with the different formats into the predetermined format."

Accordingly, Applicant respectfully submits that claim 18 recites a novel and unobvious method over Pierce and Wesinger and is therefore allowable. Applicant further submits that claims 19-23, that depend directly or indirectly from claim 18

are allowable as is claim 18 and for additional limitations recited therein.

New independent claim 49 includes, among other limitations, "receiving the address from a user using a terminal remote from the database," "authenticating the user using a cryptographic module remote from the terminal and communicating with the terminal over a wide area network," and "accessing the database from a server communicating with the terminal over the wide area network." Likewise, none of the cited references, alone or in combination, teach or suggest the above limitation.

First, the system of Pierce does not include "authenticating the user using a cryptographic module remote from the terminal and communicating with the terminal over a wide area network," because Pierce's system includes a PSD attached to the Host PC (see, FIG. 1). Second, there is no mention of a wide area network in Pierce or Wesinger. Third, the database (CD-ROM) of Pierce is not remote from the user and does not communicate over a wide area network.

Consequently, Applicant respectfully submits that new claim 49 recites a novel and unobvious method over the cited references and is therefore allowable. Applicant further submits that claims 50-53, that depend directly or indirectly from claim 49 are allowable as is claim 49 and for additional limitations recited therein.

In view of the foregoing amendment and remarks, it is respectfully submitted that this application is now in condition

for allowance, and accordingly, reconsideration and allowance
are respectfully requested.

Respectfully submitted,

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